

**Exhibit C**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

THE MIDDLE EAST FORUM,

Civil Action No.: 19-5697

Plaintiff,

v.

LISA REYNOLDS-BARBOUNIS,

Defendant.

**DECLARATION OF SCOTT E. DIAMOND IN SUPPORT OF COUNSEL'S MOTION  
FOR ATTORNEYS' FESS AND LITIGATION EXPENSES**

I Scott E. Diamond declare as follows:

1. I am an attorney that was admitted to the Pennsylvania and New Jersey Bar in 1985.
2. I am Certified by the Supreme Court of New Jersey as a Certified Civil Trial Attorney.
3. I am certified by the National Board of Trial Lawyers in Civil litigation and Civil Pre-Trial Practice.
4. I have tried to verdict well over 100 matters before Pennsylvania, New Jersey and Federal Courts.
5. I have been practicing law for approximately 37 years, and trying cases for over 30 years.
6. Based on my experience trying cases and practicing law in Pennsylvania and New Jersey, I charged an hourly rate of \$750.00 per hour for this case.
7. I was retained to assist as counsel in the instant matter on December 1, 2021.
8. Since December 1, 2021, I have worked exclusively on this matter.

9. I have reviewed all of the Pleadings, Motions and Exhibits produced by the Plaintiffs for trial, and discovery. This includes e-discovery on the junto platform and downloaded therefrom.
10. I was intricately involved in preparing the Defendant for trial and trial strategy.
11. I reviewed all of the deposition transcripts and trial transcripts of testimony of the Plaintiff's.
12. I prepared exhibit binders for the trial.
13. I have spent an average of 10 hours per day since December 1, 2021, in preparation and on trial in this matter.
14. During the trial we worked 15-hour days.
15. I spent 8 hours researching and drafting the within application for fees and costs.
16. The total number of hours I have worked on this case equals 180 hours.
17. My bill for legal services rendered is (180 hours) \* (\$750.00) = \$135,000.
18. I swear to the above under penalty of perjury.



Scott Diamond  
December 30, 2021